

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

SHIRLEY A. BANKS-BENNETT, : 1: CV-01-1241

Plaintiff :

v. :

INGRAM MICRO U.S.; INGRAM : JUDGE KANE

MICRO BRANCH #80 GENERAL :

MANAGER KEN GOODWIN (in their :

official and individual capacity); :

VICKI SMITH, SENIOR HUMAN :

RESOURCE GENERALIST (in her :

official and individual capacity); :

BILL MUNLEY, MANAGER AT :

SHIPPING DEPARTMENT, (in his :

official and individual capacity); :

Defendants :

**REPLY TO PLAINTIFF'S MOTION FOR
A SUBPOENA FOR PETER HOFFMAN**

DEFENDANT'S REPLY TO PLAINTIFF'S MOTION

1. Defendant does not oppose the request that Plaintiff be supplied a subpoena to compel the testimony of Peter Hoffman.

2. Plaintiff's Motion indicates that she needs Mr. Hoffman's social security number and that it has not been supplied to her. Mr. Hoffman is a former employee of Ingram Micro at its Central

Pennsylvania facility. Mr. Hoffman's records there containing the social security number were either destroyed or purged years ago in the normal course of business. Defendant has now obtained from its California headquarters Mr. Hoffman's social security number and that information has been provided to the Plaintiff.

Respectfully submitted,

THOMAS, THOMAS & HAVER, LLP

s/Paul J. Dellasega

Date: March 8, 2004

By:

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Attorney for Defendants, Ingram
Micro U.S., Ingram Micro Branch
#80, Ken Goodman and Bill Munley

CERTIFICATE OF SERVICE

I, Paul J. Dellasega, attorney with the law firm of Thomas, Thomas & Hafer, LLP, hereby certify that a copy of the foregoing document was served upon the following, by enclosing a true and correct copy in an envelope addressed as follows, postage prepaid:

Shirley A. Banks-Bennett
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THOMAS, THOMAS & HAVER, LLP

s/Paul J. Dellasega

Paul J. Dellasega

DATED: March 8, 2004